

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-cv-06563-LJL

**DEFENDANT'S LOCAL RULE 56.1 STATEMENT**  
**IN SUPPORT OF CROSS-MOTION FOR SUMMARY JUDGMENT**

1. In February 2010, Defendant, and his then-wife bought a condo located at 315 South Lake Drive, Unit 5D, Palm Beach, Florida (the “Palm Beach Condo”). Declaration of Rudolph W. Giuliani (“Giuliani Decl.”) ¶ 3; Giuliani Decl. Exhibit A. In January 2020, as part of a divorce distribution, Defendant became the sole owner of the Palm Beach Condo. Giuliani Decl. ¶ 4; Giuliani Decl. Exhibit B.

2. In July 2023, Defendant entered into a contract with Sotheby's International Realty, engaging Sotheby's to sell his New York apartment. Giuliani Decl. ¶¶ 5-6; Giuliani Decl. Exhibit C. Once the New York Apartment was sold, the Palm Beach Condo would be Defendant's only residence. Giuliani Decl. ¶ 7.

3. Defendant allowed his New York driver's license to expire. On February 22, 2024, Defendant was issued a Florida driver's license, at the address of the Palm Beach Condo. Giuliani Decl. ¶ 10; Giuliani Decl. Exhibit D.

4. On May 6, 2024, Defendant registered his 1980 automobile in Florida, at the address of the Palm Beach Condo, and was issued a Florida license plate. Giuliani Decl. ¶ 11; Giuliani Decl. Exhibit E.

5. On May 18, 2024, Defendant registered to vote in Florida. Giuliani Decl. ¶ 12; Giuliani Decl. Exhibit F.

6. Palm Beach County has granted homestead tax exemptions to Defendant, for 2024. Giuliani Decl. ¶ 13; Giuliani Decl. Exhibit G.

7. On July 13, 2024, Defendant made a declaration of Florida domicile, which was then recorded in the office of the Clerk of Palm Beach County. Giuliani Decl. ¶ 14; Giuliani Decl. Exhibit H.

8. For the period of time between February 2024, and August 2024:

9. When Defendant was in Palm Beach, he resided in the Palm Beach Condo.

10. When Defendant was in New York, he conducted business and visited his family.

11. When Defendant was in New Hampshire, he conducted business. He also engaged in leisure activities. For example, in April, Defendant went to New Hampshire to watch the total eclipse. During the summer (June, July and August), Defendant was in New Hampshire in order to get away from the heat and humidity of South Florida, which are bad for his lung injuries, sustained as a result of the 9/11 attacks. Giuliani Decl. ¶ 16.

12. Defendant was also in other cities for business. For example, he covered the Republican National Convention in Milwaukee, Wisconsin, and he broadcasted from Paris, France, during the summer Olympics. Giuliani Decl. ¶ 16.

13. Defendant was in Arizona for one day for a court appearance. Giuliani Decl. ¶ 16.

14. On Monday, February 12, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E341): Who is Arseniy Petrovych Yatsenyuk?” *See* Declaration of David Labkowski, Esq. (“Labkowski Decl.”) ¶ 5.

15. On Tuesday, February 13, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E342): LIVE RESULTS—New York 3rd Congressional District Special Election.” *See* Labkowski Decl. ¶ 6.

16. On Wednesday, February 14, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E343): LIVE UPDATES—Shooting in Kansas City, Missouri at the Super Bowl Parade.” *See* Labkowski Decl. ¶ 7.

17. On Thursday, February 15, 2024, Defendant broadcasted live from Boynton Beach, Florida, an episode entitled “America's Mayor Live (E344): Fani Willis & Nathan Wade on Trial.” *See* Labkowski Decl. ¶ 8.

18. On Monday, February 19, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E346): Biden Administration Continues to Capitulate on the Global Stage.” *See* Labkowski Decl. ¶ 9.

19. On Tuesday, February 20, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E347): The War on Gender.” *See* Labkowski Decl. ¶ 10.

20. On Wednesday, February 21, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E348): Joe Biden's Brother, James Biden, Testifies Behind Closed Doors.” *See* Labkowski Decl. ¶ 11.

21. On Thursday, February 22, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E349): Democrat "Russian Collusion" Hoax 2.0.” *See* Labkowski Decl. ¶ 12.

22. On Friday, February 23, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E350): ELECTION 2024—The South Carolina Primary.” *See* Labkowski Decl. ¶ 13.

23. On Monday, February 26, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E351): ELECTION 2024—Previewing Michigan's Presidential Primary.” *See* Labkowski Decl. ¶ 14.

24. On Wednesday, February 28, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E353): Our Southern Border is Facing an INVASION.” *See* Labkowski Decl. ¶ 15.

25. On Thursday, February 29, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E354): President Trump & Joe Biden's Southern Border Visits—Compare & Contrast.” *See* Labkowski Decl. ¶ 16.

26. On Friday, March 1, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E355): Joe Biden & Democrat Open-Border Policies Caused Laken Riley's Death.” *See* Labkowski Decl. ¶ 17.

27. On Monday, March 4, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E356): Supreme Court Rules Unanimously in President Donald Trump's Favor.” *See* Labkowski Decl. ¶ 18.

28. On Tuesday, March 5, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E357): ELECTION 2024—Super Tuesday.” *See* Labkowski Decl. ¶ 19.

29. On Wednesday, March 6, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E358): The REAL Reason Nikki Haley Dropped Out of the Race.” *See* Labkowski Decl. ¶ 20.

30. On Thursday, March 7, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E359): The 2024 State of the Union Address.” *See* Labkowski Decl. ¶ 21.

31. On Monday, March 11, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E361): Breaking Down Joe Biden's \$7.3 TRILLION Budget.” *See* Labkowski Decl. ¶ 22.

32. On Tuesday, March 12, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E362): The Israeli–Palestinian conflict.” *See* Labkowski Decl. ¶ 23.

33. On Wednesday, March 13, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E363): Judge DROPS Six Charges as Fani Willis's Phony RICO Case Falls Apart.” *See* Labkowski Decl. ¶ 24.

34. On Thursday, March 14, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E364): ELECTION 2024—Bellwether Michigan.” *See* Labkowski Decl. ¶ 25.

35. On Friday, March 15, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E365): The Dangers of Staying Silent in the Face of Injustice.” *See* Labkowski Decl. ¶ 26.

36. On Monday, March 18, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E366): Biden Removes "Duty, Honor, Country" from West Point Mission Statement.” *See* Labkowski Decl. ¶ 27.

37. On Tuesday, March 19, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E367): EU & The West Blast Russian Elections, but Silent on Trump Persecution.” *See* Labkowski Decl. ¶ 28.

38. On Wednesday, March 20, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E368): Biden-World PANICS as President Trump Leads Virtually Every Poll.” *See* Labkowski Decl. ¶ 29.

39. On Thursday, March 21, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E369): ELECTION 2024—America at a Crossroads.” *See* Labkowski Decl. ¶ 30.

40. On Friday, March 22, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E370): Gunman Kill at Least 40 People Inside Moscow Concert Hall.” *See* Labkowski Decl. ¶ 31.

41. On Monday, March 25, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E371): Appeals Court Rules Against Judge Engoron in Phony Fraud Case YET AGAIN.” *See* Labkowski Decl. ¶ 32.

42. On Tuesday, March 26, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E372): Bridge COLLISION/COLLAPSE in Baltimore—Sign of Decaying Infrastructure?” *See* Labkowski Decl. ¶ 33.

43. On Wednesday, March 27, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E373): Feds Search Sean 'Diddy' Combs' Properties in Sex Trafficking Probe.” *See* Labkowski Decl. ¶ 34.

44. On Thursday, March 28, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E374): Donald Trump Honors Fallen Officer; Biden Hosts High-Dollar Fundraiser.” *See* Labkowski Decl. ¶ 35.

45. On Friday, March 29, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E375): Honoring America's Real Heroes.” *See* Labkowski Decl. ¶ 36.

46. On Monday, April 1, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E376): America is Lost—2024 is about Fighting to take it Back.” *See* Labkowski Decl. ¶ 37.

47. On Tuesday, April 2, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E377): Justice for All.” *See* Labkowski Decl. ¶ 38.

48. On Wednesday, April 3, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E378): The Democrat Party's Bizarre War Against Law Enforcement.” *See* Labkowski Decl. ¶ 39.

49. On Thursday, April 4, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E379): NEW POLL—Trump Leads Biden in Six of Seven Swing States.” *See* Labkowski Decl. ¶ 40.

50. On Friday, April 5, 2024, Defendant broadcasted live from New Hampshire, an episode entitled “America's Mayor Live (E380): Earthquake Rattles New York City.” *See* Labkowski Decl. ¶ 41.

51. On Tuesday, April 9, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (282): Our Experience with the Solar Eclipse from New Hampshire.” *See* Labkowski Decl. ¶ 42.

52. On Wednesday, April 10, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (383): What to Make of the Chants of "Death to America" in Dearborn, Michigan.” *See* Labkowski Decl. ¶ 43.

53. On Thursday, April 11, 2024, Defendant broadcasted live from Tulsa, Oklahoma, an episode entitled “America's Mayor Live (384): The Fall of New York City & How the Giuliani Playbook Can Spur a Revival.” *See* Labkowski Decl. ¶ 44.

54. On Friday, April 12, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (385): Exclusive Report Warns of Imminent Attack by Iran.” *See* Labkowski Decl. ¶ 45.

55. On Monday, April 15, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E386): Biden Regime Goes ALL-IN on Dystopian Election Interference vs. Trump.” *See* Labkowski Decl. ¶ 46.



56. On Tuesday, April 16, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E387): The Consequences of the Left's Weaponization of the U.S. Justice System.” *See* Labkowski Decl. ¶ 47.

57. On Wednesday, April 17, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E388): Democrats Vote to Continue Alien Invasion.” *See* Labkowski Decl. ¶ 48.

58. On Thursday, April 18, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E389): Restricting Trump to Campaigning in New York will BACKFIRE on Democrats.” *See* Labkowski Decl. ¶ 49.

59. On Friday, April 19, 2024, Defendant broadcasted live from New Hampshire, an episode entitled “America's Mayor Live (E390): Is Mike Johnson Relying on Democrats to Save Job as Speaker?” *See* Labkowski Decl. ¶ 50.

60. On Monday, April 22, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E391): Mayor Rudy Giuliani visits Harvard University.” *See* Labkowski Decl. ¶ 51.

61. On Tuesday, April 23, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E392): Mayor Rudy Giuliani visits Columbia University.” *See* Labkowski Decl. ¶ 52.

62. On Wednesday, April 24, 2024, Defendant broadcasted live from Staten Island, New York, an episode entitled “America's Mayor Live (E393): Exposing the Truth on the College Protesters.” *See* Labkowski Decl. ¶ 53.

63. On Thursday, April 25, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E394): Supreme Court Appears Open to Partial Immunity for POTUS.” *See* Labkowski Decl. ¶ 54.

64. On Monday, April 29, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (396): Protesters at Harvard Replace American Flag with Palestinian Flag.” *See* Labkowski Decl. ¶ 55.

65. On Tuesday, April 30, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (397): The Stunning Lack of Leadership at These So-Called Elite Universities.” *See* Labkowski Decl. ¶ 56.

66. On Wednesday, May 1, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (398): The Fall of the Ivy League Institutions.” *See* Labkowski Decl. ¶ 57.

67. On Thursday, May 2, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (399): NEW POLL—Trump Widens Gap Over Biden.” *See* Labkowski Decl. ¶ 58.

68. On Monday, May 6, 2024, Defendant broadcasted live from South Florida, an episode entitled “America's Mayor Live (401): American Injustice.” *See* Labkowski Decl. ¶ 59.

69. On Tuesday, May 7, 2024, Defendant broadcasted live from Miami, an episode entitled “America's Mayor Live (402): What Cuban-Americans can teach us about Socialism.” *See* Labkowski Decl. ¶ 60.

70. On Wednesday, May 8, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (403): Game Over for Special Counsel Jack Smith & Classified Documents Case.” *See* Labkowski Decl. ¶ 61.

71. On Thursday, May 9, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (404): Judge Merchan's Conflicts & Conduct Should Immediately Disqualify Him.” *See* Labkowski Decl. ¶ 62.

72. On Friday, May 10, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (405): The Importance of Fighting Against Censorship in America.” *See* Labkowski Decl. ¶ 63.

73. On Sunday, May 12, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “Uncovering the Truth (E1): Sunday, May 12, 2024.” *See* Labkowski Decl. ¶ 64.

74. On Monday, May 13, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show: Shocking NEW Evidence of Election Fraud that WABC Doesn't Want You to See.” *See* Labkowski Decl. ¶ 65.

75. On Monday, May 13, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (406): Michael Cohen Perjures Himself.” *See* Labkowski Decl. ¶ 66.

76. On Wednesday, May 14, 2025, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E2): No One Knows Michael Cohen Like I Know Michael Cohen.” *See* Labkowski Decl. ¶ 67.

77. On Tuesday, May 14, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E407): The Truth About Michael Cohen.” *See* Labkowski Decl. ¶ 68.

78. On Wednesday, May 15, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E3): Michael Cohen's Former Attorney Bob Costello Exposes Cohen's Lies.” *See* Labkowski Decl. ¶ 69.

79. On Wednesday, May 15, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E408): Bob Costello Exposes Michael Cohen in EXPLOSIVE Congressional Hearing.” *See* Labkowski Decl. ¶ 70.

80. On Thursday, May 16, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E4): Why is Joe Biden Suddenly Eager to Debate?” *See* Labkowski Decl. ¶ 71.

81. On Thursday, May 16, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E409): Michael Cohen's Former Attorney: "He Told Me He Had Nothing On Trump".” *See* Labkowski Decl. ¶ 72.

82. On Friday, May 17, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E5): It Looks Like Michael Cohen Just Committed Perjury Again.” *See* Labkowski Decl. ¶ 73.

83. On Friday, May 17, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E410): Celebrating a Great American Life.” *See* Labkowski Decl. ¶ 74.

84. On Sunday, May 19, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “Uncovering the Truth (E2): Sunday, May 19, 2024.” *See* Labkowski Decl. ¶ 75.

85. On Monday, May 20, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E6): Michael Cohen Admits to STEALING \$60,000 from Trump Organization.” *See* Labkowski Decl. ¶ 76.

86. On Monday, May 20, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E411): "This case is dead. It was dead on arrival" - Fmr Michael Cohen Advisor.” *See* Labkowski Decl. ¶ 77.

87. On Tuesday, May 21, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E7): Arizona—The Grand Canyon State.” *See* Labkowski Decl. ¶ 78.

88. On Tuesday, May 21, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E412): Arizona—The Grand Canyon State.” *See* Labkowski Decl. ¶ 79.

89. On Wednesday, May 22, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E8): Biden Losing More and More Voters to "Uncommitted"."” *See* Labkowski Decl. ¶ 80.

90. On Thursday, May 23, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E9): President Trump Campaigns in the Bronx.” *See* Labkowski Decl. ¶ 81.

91. On Friday, May 24, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E10): President Trump RALLIES in the Bronx.” *See* Labkowski Decl. ¶ 82.

92. On Friday, May 24, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E415): President Trump's MASSIVE RALLY in the Bronx.” *See* Labkowski Decl. ¶ 83.

93. On Sunday, May 26, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “Uncovering the Truth (E3): Sunday, May 26, 2024.” *See* Labkowski Decl. ¶ 84.

94. On Monday, May 27, 2024, Defendant broadcasted live from New York, New York, an episode entitled “The Rudy Giuliani Show (E11): Memorial Day—Honoring America's Fallen Heroes.” *See* Labkowski Decl. ¶ 85.

95. On Monday, May 27, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E416): The History of Memorial Day—Honoring America's Fallen Heroes.” *See* Labkowski Decl. ¶ 86.

96. On Tuesday, May 28, 2024, Defendant broadcasted live from New York, New York, an episode entitled “The Rudy Giuliani Show (E12): In Bizarre Move, Democrats Use Robert De Niro in Trump Trial Response.” *See* Labkowski Decl. ¶ 87.

97. On Tuesday, May 28, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E417): Closing Arguments in President Trump's New York Trial.” *See* Labkowski Decl. ¶ 88.

98. On Wednesday, May 29, 2024, Defendant broadcasted live from New York, New York, an episode entitled “The Rudy Giuliani Show (E13): A Glaring Problem w/ New York Trial.” *See* Labkowski Decl. ¶ 89.

99. On Wednesday, May 29, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E418): Jury Begins Deliberations in New York Trial.” *See* Labkowski Decl. ¶ 90.

100. On Thursday, May 30, 2024, Defendant broadcasted live from New York, New York, an episode entitled “The Rudy Giuliani Show (E14): Jury Deliberations Continue in New York Trial.” *See* Labkowski Decl. ¶ 91.

101. On Thursday, May 30, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E419): Reaction to Guilty Verdict in President Trump's New York Trial.” *See* Labkowski Decl. ¶ 92.

102. On Thursday, May 30, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E419): Reaction to Guilty Verdict in President Trump's New York Trial.” *See* Labkowski Decl. ¶ 93.

103. On Friday, May 31, 2024, Defendant broadcasted live from New York, New York, an episode entitled “The Rudy Giuliani Show (E15): Breaking Down the Most Disgraceful & Illicit Trial in American History.” *See* Labkowski Decl. ¶ 94.

104. On Sunday, June 2, 2024, Defendant broadcasted live from New York, New York, an episode entitled “Uncovering the Truth (E4): American Injustice.” *See* Labkowski Decl. ¶ 95.

105. On Monday, June 3, 2024, Defendant broadcasted live from New York, New York, an episode entitled “The Rudy Giuliani Show (E16): Illegal Immigrant SHOOTS Two NYPD Officers in Brazen Attack.” *See* Labkowski Decl. ¶ 96.

106. On Monday, June 3, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E421): Hunter Biden Trial Day 1—Jury Selected; Opening Statements on Tuesday.” *See* Labkowski Decl. ¶ 97.

107. On Tuesday, June 4, 2024, Defendant broadcasted live from New York, New York, an episode entitled “The Rudy Giuliani Show (E17): Joe Biden's Executive Order on Border an Election Year Gimmick.” *See* Labkowski Decl. ¶ 98.

108. On Tuesday, June 4, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E422): Hunter Biden Trial Day 2—Opening Statements, First Witness Takes Stand.” *See* Labkowski Decl. ¶ 99.

Dated: October 16, 2024  
New York, New York

Respectfully Submitted,

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